

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN THE MATTER OF:

STAYMOBILE VENTURE LLC

Chapter 7
Case No. 22-43781-lsg
Hon. Lisa S. Getchko

Debtor(s)

/

Cover Sheet for Motion to Approve Sale Procedures

The Trustee, Timothy J. Miller, has filed a motion for approval of procedures for the sale of assets, which is attached to this cover sheet. Pursuant to E.D. Mich. LBR 6004-1, the Trustee has identified below, by page and paragraph number, the location in the proposed order accompanying the motion of each of the following provisions:

PROVISION	Contained in proposed order	Location in proposed order
(1) Provisions concerning the qualifications of the bidding parties.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Page __, ¶ __
(2) Provisions concerning the criteria for a qualifying bid and any deadlines for (i) submitting such a bid, and (ii) notification of whether the bid made constitutes a qualifying bid.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Page __, ¶ __
(3) Provisions that require qualified bids to identify points of variation from the stalking horse bid (including price and other terms).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Page __, ¶ __
(4) Provisions pertaining to the conditions to the qualified bidders' obligation to consummate the purchase (including the time period within which the purchaser must close the transaction).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Page __, ¶ __
(5) Provisions pertaining to the amount required for a good faith deposit.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Page __, ¶ __

(6) Provisions that relate to a "Back-Up Buyer" should the first winning bidder fail to close the transaction within a specified period of time.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Page __, ¶ __
(7) No-shop or No-Solicitation provisions including the justification for such provision.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Page __, ¶ __
(8) Provisions relating to Break-Up fees, Topping fees, and/or Expense Reimbursement (including the waiver of such fees due to rebidding).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Page __, ¶ __
(9) Provisions specifying the bidding increments.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Page __, ¶ __
(10) Provisions relating to auction procedures including manner in which auction is to be conducted and when the auction will be open and when it will close.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Page <u>2</u> , ¶ <u>3</u>
(11) Provisions relating to whether the auction will occur and the termination of the auction process and/or sale.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Page <u>2</u> , ¶ <u>3</u>
(12) Provision whether 10 day stay of Fed. R. Bankr. P. 6004(g) and 6006(d) is waived.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Page <u>4</u> , ¶ <u>14</u>
(13) Provisions regarding timing for notice, submission of bids, objections to sale and other key events.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Page __, ¶ __

Respectfully submitted,

OSIPOV BIGELMAN, P.C.

Dated: June 28, 2022

/s/ Anthony J. Miller

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